

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WI-LAN INC.,)
Plaintiff,)
v.) 10 Civ. 432 (LAK) (AJP)
LG ELECTRONICS, INC. and LG)
ELECTRONICS U.S.A., INC.,)
Defendants.

DECLARATION OF MICHAEL A. DOLAN

I, Michael D. Dolan, declare as follows:

1. I am an independent expert consultant retained to assist Wi-LAN, Inc. in this case. The following facts are within my personal knowledge and if called as a witness by the Court, I would be competent to testify to the matters set forth below.

2. I hold a BS degree in Electrical Engineering and have both taken and taught graduate courses in mathematics, software and computer graphics. I am a Fellow of the Society of Motion Picture and Television Engineers (SMPTE) and currently serve on its Board of Governors, representing the Hollywood section. I am also a recipient of the Advanced Television Systems Committee (ATSC) Bernard J. Lechner Outstanding Contributor Award. I chair a number of television-related technical committees in SMPTE and ATSC, including ATSC S13 on Data Broadcasting. I actively participate in numerous other technical television and media committees including the Consumer Electronics Association (CEA). I am knowledgeable about ATSC standards, specifically including A/65 which sets forth the design for the emission of the Rating Region Table (RRT) and Content Advisory Descriptor (CAD). I

am also knowledgeable about CEA standards related to television, specifically CEA-766 which sets forth the receiver practices for the processing of ratings information in the ATSC system. I also have extensive experience in the C programming language.

3. I have been asked, and I have provided an expert report on issues involving the patent-in-suit in this case. I am therefore competent to testify, and if I am asked I may testify, as to any of the facts and/or expert opinions discussed in these reports, which are identified below.

4. The information provided within the report entitled Opening Expert Report and Disclosure of Michael A. Dolan Under Rule 26(a)(2)(B), Fed. R. Civ. P. ("Dolan Report") attached hereto as Ex. A, is a fair and accurate reflection of the facts and opinions that if asked I may testify to regarding each of the topics discussed therin.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 17 day April, 2011 at DEL MAR, CA.


Michael A. Dolan

Exhibit A

Document filed
under seal.